

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROBERT DUNN,

Plaintiff,

V.

**THE HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY,**

Defendant.

No. 07-cv-06601

Judge Manning
Magistrate Judge Valdez

PROPOSED SCHEDULING ORDER

1. Discovery

The following time limits and deadlines shall be applicable:

- A. All disclosures required by Rule 26(a)(1) shall be made on or before May 1, 2008.
- B. Any amendments to pleadings or actions to join other parties shall be filed on or before May 15, 2008. (It is recommended that any joinder or amendments be made early in the discovery process so as to avoid the need to prolong discovery as to new parties or new issues.)
- C. The cutoff for fact discovery is September 15, 2008.
- D. The parties shall disclose expert testimony pursuant to Rule 26(a)(2) on or before October 15, 2008.
- E. The parties may depose the other side's expert at any time prior to December 1, 2008.
- F. The parties shall disclose any rebuttal expert pursuant to Rule 26(a)(2)(c) at any time prior to December 30, 2008.
- G. The parties shall have until January 30, 2009 to depose the opposing party's rebuttal expert.

2. Motions

- A. Any dispositive motions to be filed on or before February 27, 2009.

B. Any *Daubert* motions to be filed on or before February 27, 2009.

3. Final Pretrial Order and Conference

The final pretrial order shall be filed on or before May 29, 2009. (Ordinarily this date will be 90 days after the deadline for dispositive motions.)

The final pretrial conference will be held on _____ at _____.m. (This date and time will be set by the Court at the Rule 16 conference.)

4. Trial

Trial is set in this matter on _____ at 10:00 a.m. (The trial date will be set by the Court at the Rule 16 conference.)

5. Status Hearings

A further status hearing/preliminary pretrial conference should be held on July 15, 2008 at 9:45 a.m.

ENTERED:

Dated: _____

HON. MARIA VALDEZ
United States Magistrate Judge